

**UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES
PRACTICES, AND PRODUCTS
LIABILITY LITIGATION**

MDL No. 2738 (MAS) (RLS)

**SPECIAL MASTER ORDER NO. 16
(ADDRESSING PLAINTIFFS' CONFIDENTIALITY DESIGNATIONS)**

The Special Master ("SM") having heard oral argument via Zoom on September 22, 2023, on J&J's application to strike the "Confidentiality" designations on the documents of Dr. Saed and Dr. Smith-Bindman; and the SM having read its Oral Opinion and ruling into the record after oral argument concluded; and this Order intending to confirm the SM's ruling; and for all the reasons stated in the SM's Oral Opinion that will be included in the transcript of proceedings,

IT IS HEREBY ORDERED this 25th day of September, 2023, that J&J's Application is GRANTED; and it is further

ORDERED as follows:

1. All "ATTORNEY'S EYES ONLY" and "CONFIDENTIAL" designations on the documents of Dr. Saed and Dr. Smith-Bindman that are the subject of J&J's Application are STRICKEN.
2. Except as otherwise stated in this Order, the status quo shall remain in effect at least until the fourteen (14) day time period for plaintiffs to appeal expires. If an appeal is not timely taken, this Order shall be fully implemented. If an appeal is taken, the status quo shall remain in effect until the appeal is decided or as otherwise provided in a Court Order.
3. Despite the status quo requirement, and in order to avoid undue prejudice to defendants, and to the extent not already done, defendants are immediately permitted to reveal the subject documents to their experts and

in-house counsel working on the defense of this talc litigation. To the extent not already done, defendants may also share the letter briefs submitted in connection with this dispute.

4. Plaintiffs shall serve UCSF with a copy of this Order.
5. This Order only addresses documents that have been produced to date and not what happens in the future.

By: /s/ Joel Schneider
Hon. Joel Schneider (Ret.)
Special Master

DATED: September 25, 2023